



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

201-15532

JUN 28 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Edwin L. Mongan, III  
Manager, Environmental Stewardship  
DuPont Safety, Health & Environment  
Excellence Center  
1007 Market Street Street, Dupont 6082  
Wilmington, Delaware 19898

Dear Mr. Mongan:

Thank you for your letters dated March 14, 2003 and March 17, 2003 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. We apologize for the delay in responding.

Your letters state that DuPont no longer manufactures or imports CAS #138-25-0 (1,3-Dimethyl 5-sulfoisophthalate and CAS #144-62-7 (Oxalic Acid), and request that these chemicals be redesignated as no longer HPV. Further, your letter of March 17 requests that DuPont be removed as the sponsor of these two chemicals. Please be advised that these chemicals are currently categorized as unsponsored.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical doesn't meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. Our review of publicly available IUR reporting data indicates that E. I. Dupont de Nemours & Co., Inc. reported on CAS #138-25-0 in 1998, and that several companies reported on CAS #144-62-7 in both 1998 and 2002. Therefore, EPA has determined that CAS #138-25-0 (1,3-Dimethyl 5-sulfoisophthalate) and CAS #144-62-7 (Oxalic Acid) do not meet the no longer HPV criteria.

We will post your letters, accompanied by our reply, on the ChemRTK website as soon as possible. The posting of your letters will serve as a means of advising the general public and interested parties that DuPont no longer sponsors, manufactures or imports these two chemicals. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsc hotline@epa.gov](mailto:tsc hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201

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